

ORIGINAL 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 ROBERT A. GROSS,

Defendant.

Case: 2:17-cr-20790
Judge: Cohn, Avern
MJ: Whalen, R. Steven
Filed: 11-20-2017 At 04:16 PM
INFO USA V. ROBERT GROSS (DA)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

18 U.S.C. § 1343
(Wire Fraud)

From at least in or around 2013 to at least in or around June 2016, in the Eastern District of Michigan and elsewhere, the defendant, **ROBERT A. GROSS**, devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises and omissions.

As part of the scheme, **ROBERT A. GROSS** made false representations to numerous creditors so as to secure funds from those creditors for the benefit of PERSON A and PERSON B. In furtherance of the scheme, **ROBERT A. GROSS**,

on or about June 7, 2016, caused to be transmitted, by means of wire communication in interstate commerce, signals and sounds. Specifically, in furtherance of the above-described scheme to defraud, on or about June 7, 2016, **ROBERT A. GROSS** caused the transmission of an interstate wire transfer of \$125,000 from a bank account belonging to Victim D.A. to a bank account belonging to PERSON A and PERSON B through the Fedwire Funds Transfer System.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

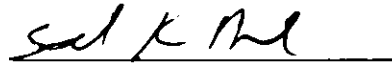
The allegations contained in this Information above are incorporated by reference as if set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, 2461(c).


As a result of the violations of Title 18, United States Code, Section 1343, as alleged above, defendant, Robert A. Gross, shall forfeit to the United States any property, real or personal, constituting, or derived from, any gross proceeds obtained, directly or indirectly, as a result of such violations, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek to forfeit any other property of defendant up to the value of the above-described property subject to forfeiture.

KEVIN M. MULCAHY
ATTORNEY FOR
THE UNITED STATES
ACTING UNDER AUTHORITY
CONFERRED BY 28 U.S.C. § 515


John K. Neal
Assistant U.S. Attorney
Chief, White Collar Crime Unit


Andrew J. Yahkind
Assistant U.S. Attorney

Dated: 11/20/17

ORIGINALUnited States District Court
Eastern District of Michigan**Criminal Case Co**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>AY</i>

Case Title: USA v. U.S. v. Robert A. GrossCounty where offense occurred : Oakland CountyCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty Indictment/ ☒ Information --- no prior complaint. Indictment/ Information --- based upon prior complaint {Case number: _____} Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
ROBERT A. GROSS	18 USC §1343 Wire Fraud	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 20, 2017
Date


 Andrew Yahkind
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9565
 Fax: (313) 226-2873
 E-Mail address: Andrew.yahkind@usdoj.gov
 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.